

# EXHIBIT “G”

**From:** [Braithwaite, Jared J.](#)  
**To:** [Stuart Lapp](#); [Josh Redelman](#)  
**Cc:** [Bret Davis](#); [Tracy Sebesta](#); [Steely, Rachel Powitzky](#); [Momanaee, Audrey F.](#); [Brian A. Baker](#)  
**Subject:** RE: Voicemail - NOV v. Garza  
**Date:** Thursday, July 28, 2022 7:29:42 PM  
**Attachments:** [image007.png](#)  
[image008.png](#)  
[image009.png](#)

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Stuart and Josh:

Regarding a motion for sanctions against NOV, we also intend to request that the Court shorten the “safe harbor” under Rule 11(c)(2) such that if NOV’s motion is not withdrawn or appropriately corrected then the Rule 11-aspect of the sanctions motion can be decided before or concurrent with a decision on NOV’s motion.

Please let me know if you will oppose such a request. I am available at your convenience tomorrow to confer on the issue, and ask that you provide some times that you are available (unless you tell me that NOV believes a conference is unnecessary).

Sincerely,

**Jared J. Braithwaite**  
*Partner*

**Foley & Lardner LLP | Salt Lake City, UT**  
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**From:** Stuart Lapp <[slapp@stibbsco.com](mailto:slapp@stibbsco.com)>  
**Sent:** Wednesday, July 27, 2022 6:05 PM  
**To:** Braithwaite, Jared J. <[JBraithwaite@foley.com](mailto:JBraithwaite@foley.com)>; Josh Redelman <[jredelman@stibbsco.com](mailto:jredelman@stibbsco.com)>  
**Cc:** Bret Davis <[bdavis@stibbsco.com](mailto:bdavis@stibbsco.com)>; Tracy Sebesta <[tsebesta@stibbsco.com](mailto:tsebesta@stibbsco.com)>; Steely, Rachel Powitzky <[rsteely@foley.com](mailto:rsteely@foley.com)>; Momanaee, Audrey F. <[amomanaee@balch.com](mailto:amomanaee@balch.com)>  
**Subject:** RE: Voicemail - NOV v. Garza

**\*\* EXTERNAL EMAIL MESSAGE \*\***

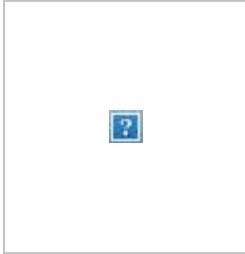
Jared:

I am available to meet and confer tomorrow between 10:00 am CDT and 2:30 pm CDT.

**Stuart W. Lapp**  
*Managing Partner*  
**Stibbs & Co., P.C., Attorneys**  
819 Crossbridge Dr., Spring, Texas 77373  
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**From:** Braithwaite, Jared J. <[JBraithwaite@foley.com](mailto:JBraithwaite@foley.com)>

**Sent:** Wednesday, July 27, 2022 10:59 AM

**To:** Josh Redelman <[jredelman@stibbsco.com](mailto:jredelman@stibbsco.com)>

**Cc:** Stuart Lapp <[slapp@stibbsco.com](mailto:slapp@stibbsco.com)>; Bret Davis <[bdavis@stibbsco.com](mailto:bdavis@stibbsco.com)>; Tracy Sebesta <[tsebesta@stibbsco.com](mailto:tsebesta@stibbsco.com)>; Steely, Rachel Powitzky <[rsteely@foley.com](mailto:rsteely@foley.com)>; Momanaee, Audrey F. <[amomanaee@balch.com](mailto:amomanaee@balch.com)>

**Subject:** RE: Voicemail - NOV v. Garza

Josh and Stuart:

Today or tomorrow, please be prepared to meet and confer on a motion for sanctions against NOV, pursuant to Rule 11, 28 USC 1927, and the Court's inherent authority based on NOV's filing last night and NOV other misconduct as inventoried in my letters to you. Array may seek the entirety of its attorneys' fees related to this matter based on NOV's misconduct and misrepresentations.

Specifically, please be prepared to discuss the following:

- NOV's good faith basis, if any, and to state that "Array refused to comply with the subpoena" when NOV explicitly withdrew the subpoena recorded in an email to me from Stuart on July 13, 2022.
- NOV's good faith basis, if any, existing law, or non-frivolous argument to seek enforcement of a subpoena in the Southern District of Texas that, before its withdrawal, requested compliance in New Mexico such that any motion to seek enforcement of the subpoena (if it had not been withdrawn) would be required in the District of New Mexico.

- NOV's good faith basis, if any, existing law, or non-frivolous argument to seek direct access to Array's electronic devices without first making requests to Array to search for and produce documents from those devices—especially in light of NOV awareness of *In re Weekley* and its description of federal law that requires the responding party to have "defaulted in its obligation to search its records and produce the requested data" before seeking direct access to electronic devices.

Please let me know as soon as possible when you are available for this requested conference.

Sincerely,

**Jared J. Braithwaite**

*Partner*

**Foley & Lardner LLP | Salt Lake City, UT**

Phone 801.401.8920

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**From:** Josh Redelman <[jredelman@stibbsco.com](mailto:jredelman@stibbsco.com)>

**Sent:** Monday, July 25, 2022 11:45 AM

**To:** Braithwaite, Jared J. <[JBraithwaite@foley.com](mailto:JBraithwaite@foley.com)>

**Cc:** Stuart Lapp <[slapp@stibbsco.com](mailto:slapp@stibbsco.com)>; Bret Davis <[bdavis@stibbsco.com](mailto:bdavis@stibbsco.com)>; Tracy Sebesta <[tsebesta@stibbsco.com](mailto:tsebesta@stibbsco.com)>

**Subject:** Voicemail - NOV v. Garza

**\*\* EXTERNAL EMAIL MESSAGE \*\***

Jared,

I hope you and your wife had an enjoyable vacation. I just left you a voicemail regarding the possible examination of the Array laptop and cell phone.

If you could, please give me a call back at (281)323-6009.

Respectfully,

**Josh Redelman**

*Attorney at Law*

**Stibbs & Co., P.C., Attorneys**

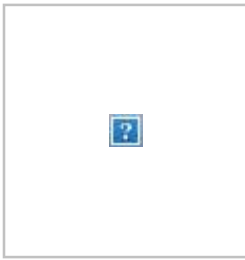
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